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14	Oracle America, Inc., and Oracle International Corp.	
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	UNITED STATES I	DISTRICT COURT
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16	UNITED STATES I	
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16	DISTRICT O	
16 17 18	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware	F NEVADA  Case No 2:10-cv-00106-LRH-PAL
16 17	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL	F NEVADA  Case No 2:10-cv-00106-LRH-PAL  PLAINTIFFS' MOTION TO SEAL
16 17 18 19	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware	F NEVADA  Case No 2:10-cv-00106-LRH-PAL
16 17 18	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL	Case No 2:10-cv-00106-LRH-PAL  PLAINTIFFS' MOTION TO SEAL UNREDACTED COPY OF PLAINTIFFS' MOTION TO MODIFY PROTECTIVE ORDER AND
16 17 18 19	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,	Case No 2:10-cv-00106-LRH-PAL  PLAINTIFFS' MOTION TO SEAL UNREDACTED COPY OF PLAINTIFFS' MOTION TO MODIFY PROTECTIVE ORDER AND EXHIBITS A, D, AND E TO THE
16 17 18 19 20 21	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,  Plaintiffs, v.	Case No 2:10-cv-00106-LRH-PAL  PLAINTIFFS' MOTION TO SEAL UNREDACTED COPY OF PLAINTIFFS' MOTION TO MODIFY PROTECTIVE ORDER AND
16 17 18 19 20	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,  Plaintiffs, v.  RIMINI STREET, INC., a Nevada corporation;	Case No 2:10-cv-00106-LRH-PAL  PLAINTIFFS' MOTION TO SEAL UNREDACTED COPY OF PLAINTIFFS' MOTION TO MODIFY PROTECTIVE ORDER AND EXHIBITS A, D, AND E TO THE
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16 17 18 19 20 21 22	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,  Plaintiffs, v.  RIMINI STREET, INC., a Nevada corporation; SETH RAVIN, an individual,	Case No 2:10-cv-00106-LRH-PAL  PLAINTIFFS' MOTION TO SEAL UNREDACTED COPY OF PLAINTIFFS' MOTION TO MODIFY PROTECTIVE ORDER AND EXHIBITS A, D, AND E TO THE
16 17 18 19 20 21 22 23 24	ORACLE USA, INC., a Colorado corporation; ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,  Plaintiffs, v.  RIMINI STREET, INC., a Nevada corporation; SETH RAVIN, an individual,	Case No 2:10-cv-00106-LRH-PAL  PLAINTIFFS' MOTION TO SEAL UNREDACTED COPY OF PLAINTIFFS' MOTION TO MODIFY PROTECTIVE ORDER AND EXHIBITS A, D, AND E TO THE
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1	Pursuant to the Stipulated Protective Order governing confidentiality of documents
2	entered by the Court on May 21, 2010, Dkt. 55 ("Protective Order"), and Rules 5.2 and 26(c) of
3	the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and
4	Oracle International Corporation (together "Oracle" or "Plaintiffs") respectfully request that the
5	Court order the Clerk of the Court to file under seal an unredacted copy of Plaintiffs' Motion to
6	Modify Protective Order (the "Motion to Modify"), as well as Exhibits A, D, and E to the
7	Declaration of Chad Russell in Support of Plaintiffs' Motion to Modify Protective Order
8	("Russell Declaration"). An unredacted copy of the Motion to Modify, as well as Exhibits A, D,
9	and E were individually lodged under seal with the Court on March 12, 2012. See Dkt. 274-277.
10	Sealing the unredacted Motion to Modify is requested because the redacted portions of
11	the motion contains information that CedarCrestone, Inc. ("CedarCrestone"), the party which
12	produced the information, has designated as "Confidential Information" and "Highly
13	Confidential Information - Attorneys' Eyes Only" under the terms of the Protective Order.
14	Likewise sealing of Exhibits A, D, and E is requested because these documents have been
15	designated as "Confidential Information" and "Highly Confidential Information - Attorneys'
16	Eyes Only" by CedarCrestone. The Protective Order states, "Counsel for any Designating Party
17	may designate any Discovery Material as 'Confidential Information' or 'Highly Confidential
18	Information – Attorneys' Eyes Only' under the terms of this Protective Order only if such
19	counsel in good faith believes that such Discovery Material contains such information and
20	is subject to protection under Federal Rule of Civil Procedure 26(c). The designation by any
21	Designating Party of any Discovery Material as 'Confidential Information' or 'Highly
22	Confidential Information - Attorneys' Eyes Only' shall constitute a representation that an
23	attorney for the Designating Party reasonably believes there is a valid basis for such
24	designation." Protective Order ¶ 2 (emphasis supplied).
25	CedarCrestone has identified the information redacted in the Motion to Modify as well as
26	Exhibits A, D, and E as Confidential and Highly Confidential, and therefore CedarCrestone has
27	represented that good cause exists for sealing those portions of the documents. This is a
28	sufficient showing of good cause to permit a sealing order on a non-dispositive motion. See,

## Case 2:10-cv-00106-LRH-P/AIF | Document 2793 | Filed 05/19/12 | Page 3 of 3

1	e.g., Pacific Gas and Elec. Co. v. Lynch	, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).		
2	Oracle has submitted all non-redacted portion so the Motion to Modify as well as all			
3	other exhibits to the Russell Declaration	other exhibits to the Russell Declaration for filing in the Court's public files, which would allow		
4	public access to all but the redacted port	public access to all but the redacted portions of the Motion to Modify and Exhibits A, D, and E.		
5	Accordingly, the request to seal is narro	Accordingly, the request to seal is narrowly tailored.		
6	For the foregoing reasons, Oracle	For the foregoing reasons, Oracle respectfully requests that the Court find that good cause		
7	exists to file under seal the unredacted copy of the Motion to Modify and Exhibit A, D, and E to			
8	3 the Russell Declaration.			
9				
10	DATED: May 14, 2012	BINGHAM McCUTCHEN LLP		
11	L			
12	2	By: /s/ Geoffrey M. Howard		
13	3	Geoffrey M. Howard Attorneys for Plaintiffs		
14	1	Oracle USA, Inc., Oracle America, Inc.,		
15	5	and Oracle International Corp.		
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	Oracle America, Inc. and Oracle International	
14	Corp.	
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	UNITED STATES	DISTRICT COURT
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	DISTRICT C	OF NEVADA
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10	ORACLE USA, INC., a Colorado corporation;	Case No 2:10-cv-00106-LRH-PAL
18	ORACLE AMERICA, INC., a Delaware	Case 110 2.10 ev 00100 ERTI 171E
10	corporation; and ORACLE INTERNATIONAL	[PROPOSED] ORDER GRANTING
19	CORPORATION, a California corporation,	PLAINTIFFS' MOTION TO SEAL
••	Cold Old 111011, a Camorina corporation,	UNREDACTED COPY OF
20	Plaintiffs,	PLAINTIFFS' MOTION TO MODIFY
31	V.	PROTECTIVE ORDER AND
21	v.	EXHIBITS A, D, AND E TO THE
22	RIMINI STREET, INC., a Nevada corporation;	DECLARATION OF CHAD RUSSELL
22	SETH RAVIN, an individual,	DECEMENTION OF CHIED RESSELLE
22	SETTI KAYIN, ali maividual,	
23	Defendants.	
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1	[PROPOSED] ORDER
2	Pending before this Court is Plaintiffs Oracle USA, Inc., Oracle America, Inc., and
3	Oracle International Corporation (together "Oracle" or "Plaintiffs") Motion to Seal Unredacted
4	Copy of Plaintiffs' Motion to Modify Protective Order [Dkt. 274] and Exhibit A [Dkt. 275],
5	Exhibit D [Dkt. 276], and Exhibit E [Dkt. 277] to the Declaration of Chad Russell. Federal Rule
6	of Civil Procedure 26(c) provides broad discretion for a trial court to permit sealing of court
7	documents for, inter alia, the protection of "a trade secret or other confidential research,
8	development, or commercial information." Fed. R. Civ. P. 26(c). Having considered Plaintiffs'
9	Motion to Seal, compelling reasons having been shown, and good cause existing:
10	IT IS HEREBY ORDERED THAT Plaintiffs' Motion to Seal is GRANTED. The
11	Clerk of the Court shall file under seal the unredacted copy of Plaintiffs' Motion to Modify
12	Protective Order and Exhibits A, D, and E to the Declaration of Chad Russell in Support of
13	Plaintiffs' Motion to Modify Protective Order.
14	IT IS SO ORDERED.
15	DATED: May 15, 2012
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17	By: Jugan a. Jeen
18	By: Yeen Peggy A. Leen
19	United States Magistrate Judge
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